

Annual 47 C.F.R. § 64.2009(e) CPNI Certification

EB Docket 06-36

Annual 64.2009(e) CPNI Certification for 2019 covering the prior calendar year 2018

1. Date filed: February 20, 2019
2. Name of company(s) covered by this certification:
123.Net, Inc.
3. Form 499 Filer ID: 825633
4. Name of signatory: James Kandler
5. Title of signatory: Chief Operating Officer
6. Certification:

I, James Kandler, certify that I am an officer of the company named above, and acting as an agent of the company, that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. See 47 C.F.R. § 64.2001 *et seq.*

Attached to this certification is an accompanying statement explaining how the company's procedures ensure that the company is in compliance with the requirements (including those mandating the adoption of CPNI procedures, training, recordkeeping, and supervisory review) set forth in section 64.2001 *et seq.* of the Commission's rules.

The company **has not** taken actions (*i.e.*, proceedings instituted or petitions filed by a company at either state commissions, the court system, or at the Commission against data brokers) against data brokers in the past year.

The company **has not** received customer complaints in the past year concerning the unauthorized release of CPNI.

The company represents and warrants that the above certification is consistent with 47 C.F.R. § 1.17 which requires truthful and accurate statements to the Commission. The company also acknowledges that false statements and misrepresentations to the Commission are punishable under Title 18 of the U.S. Code and may subject it to enforcement action.

Signed



Attachments: Accompanying Statement explaining CPNI procedures

CPNI Procedures

123.Net (123NET) has instituted an employee training program to educate all employees who have access to customer CPNI information on how CPNI information may be used. 123NET does NOT use Call Detail Records CPNI information, such as date/time of calls, duration of calls, destination numbers, or a list of customers' subscribed services without explicit authorization/verification from the customer.

123NET does not provide or sell any CPNI information of its customers to any third party vendor/telemarketer/data broker, or any mass marketing at this time. 123NET also does not offer additional 123NET services to an existing customer without that customer first inquiring about additional services.